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Counsel for Movants Greg Lindberg,

Global Growth Holdings, Inc., and

New England Capital, LLC

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 15
: PB LIFE AND ANNUITY CO. LTD, et al, : Case No. 20-12791 (SCC)
: Debtor in Foreign Proceeding. : (Jointly Administered)

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NOTICE OF FILING

Movants Greg E. Lindberg, Global Growth Holdings, Inc., and New England Capital, LLC (collectively, "Movants"), by and through the undersigned counsel, hereby submit this

Notice of Filing in connection with *Movants' Emergency Motion for Relief from Automatic Stay* and the Court's Recognition Order at ECF 33 (the "Motion for Relief"), and in support show:

Pursuant to the Court's request on July 13, 2022, Movants submit the attached Omnibus Membership Interest Contribution Agreement, which is a draft specimen of the documents that Movants may be ordered to contribute to the registry of the North Carolina court, as described in the Motion for Relief.

Dated: July 18, 2022 New York, New York

Respectfully Submitted,

CONDON TOBIN SLADEK THORNTON NERENBERG PLLC

/s/ Jared T.S. Pace

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